

No. 22-12217

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**In the United States Court of Appeals  
for the Eleventh Circuit**

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TAMARAH C. LOUIS and EMMANUEL LOUIS, JR., individually, and on  
behalf of all others similarly situated,  
*Plaintiffs-Appellants,*

v.

BLUEGREEN VACATIONS UNLIMITED, INC., a Florida corporation and  
BLUEGREEN VACATIONS CORPORATION, a Florida corporation,  
*Defendants-Appellees.*

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On Appeal from the United States District Court  
for the Southern District of Florida  
Case No. 21-cv-61938 (The Hon. Rodolfo A. Ruiz, II)

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**APPELLANTS' UNOPPOSED MOTION FOR AN EXTENSION OF  
TIME TO FILE REPLY BRIEF**

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March 28, 2023

*Counsel for Plaintiffs-Appellants*

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**CERTIFICATE OF INTERESTED PERSONS AND CORPORATE  
DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26(b) and Eleventh Circuit Rule 26.1, Appellants hereby disclose the following list of known persons, associated persons, firms, partnerships or corporations that have a financial interest in the outcome of this case, including all subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal entities related to a party in this case:

Bennett, Jennifer D.

Bluegreen Vacations Corporation

Bluegreen Vacations Unlimited, Inc.

Gupta Wessler PLLC

Louis, Jr., Emmanuel G.

Louis, Tamarah C.

Mead, Grace L.

Nathan, Andrea N.

National Association of Consumer Advocates

Onorati, Joseph J.

Peterson, Matthew T.

Rheingold, Ira

Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A.

Varnell & Warwick, P.A.

Varnell, Janet R.

Warwick, Brian W.

Willis, Erika R.

Pursuant to 11th Cir. R. 26.1-3(b), Bluegreen Vacations Holding Corporation (NYSE: BVH), is the parent company for Defendant-Appellee.

Dated: March 28, 2023

/s/ Jennifer D. Bennett  
Jennifer D. Bennett

*Counsel for Plaintiffs-Appellants*

**UNOPPOSED MOTION TO EXTEND DEADLINE  
TO FILE APPELLANTS' REPLY BRIEF**

Pursuant to Federal Rule of Appellate Procedure 26(b) and Eleventh Circuit Rules 26-1 and 31-2, Appellants Tamarah C. Louis and Emmanuel G. Louis, Jr. respectfully move this court for an extension of fourteen (14) days to file their reply brief through and including April 19, 2023. In support of the motion, Appellants state:

1. This case presents an issue of national importance to military servicemembers: the application of the Military Lending Act, 10 U.S.C. § 987.

2. Although appellants previously received an unopposed 30-day extension on this brief, there is good cause for this additional request of 14 days. Lead appellate counsel Jennifer D. Bennett—as well as the other members of her firm—have several pressing obligations that have taken up and will continue to take up substantial time over the next month, including several that are new and therefore could not have been anticipated at the time of the initial extension request. Absent a 14-day extension, these obligations will make it difficult to properly prepare the brief. Specifically, Ms. Bennett and her colleagues have the following upcoming deadlines:

- A reply in support of certiorari due in the U.S. Supreme Court in *Lombardo v. City of St. Louis*, No. 22-510, on March 29, 2023;
- An oral argument in the District of Columbia Court of Appeals in *Salem Media, Inc. v. Awan*, No. 21-cv-0893, on March 29, 2023;

- An oral argument in the California Court of Appeals in *Ochoa v. Ford*, No. B312261, on March 30, 2023;
- An oral argument in the Colorado Supreme Court in *Aurora Public Schools v. Saupe*, No. 2022SC824, on April 4, 2023;
- A reply brief due in the Eleventh Circuit in *Mayer v. Holiday Inn*, No. 22-11734, on April 5, 2023;
- An oral argument in the Second Circuit in *Edmundson v. Klarna*, No. 22-557, on April 10, 2023;
- A brief in opposition due in the U.S. Supreme Court in *Vidal v. Elster*, No. 22-704, on April 11, 2023;
- An oral argument in the California Courts of Appeal in *Lanier v. Ford*, No. B315114, on April 13, 2023;
- A response brief due in the Fourth Circuit in *Alig v. Quicken Loans*, No. 22-2289, on April 19, 2023.

4. Certificate of Counsel. Undersigned counsel has consulted with counsel for the Appellees, and Appellees do not oppose to this request.

5. This motion is filed in good faith and not for the purposes of delay.

For the foregoing reasons, the motion to extend the time for serving Appellants' reply brief by fourteen (14) days until April 19, 2023 should be granted.

March 28, 2023

Respectfully submitted,

/s/ Jennifer D. Bennett

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*Counsel for Plaintiff-Appellant*

### **CERTIFICATE OF COMPLIANCE**

This motion complies with the type-volume limitation of Federal Rule of Appellate Procedure 27(d)(2)(A) because this motion contains 423 words. This motion complies with the typeface requirements of Rule 32(a)(5) and the type-style requirements of Rule 32(a)(6) because it has been prepared in proportionally spaced typeface using Microsoft Word in 14-point Baskerville font.

March 28, 2023

/s/ Jennifer D. Bennett  
Jennifer D. Bennett

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2023, I electronically filed the foregoing motion with the Clerk of the Court of the U.S. Court of Appeals for the Eleventh Circuit by using the CM/ECF system. All participants are registered CM/ECF users and will be served by the CM/ECF system.

/s/ Jennifer D. Bennett  
Jennifer D. Bennett